

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

*This document relates to:*

“Track 3 Cases”

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**WALGREENS’ FURTHER RESPONSE TO THE  
COURT’S OCTOBER 7, 2022 ORDER**

In response to the Special Master’s October 18, 2022 email, Defendant Walgreen Co. (“Walgreens”) submits this further response to the Court’s October 7, 2022 Order (Doc. 4669) requesting information about the extent to which Defendants are already in compliance with the Court’s Injunction Order (Doc. 4611-1) or what additional steps are required.

To provide further description and detail regarding Walgreens’ original response (Doc. 4676, Ex. B), and in accordance with the Special Master’s instruction to “append[] appropriate corporate documents and/or sworn affidavits,” Walgreens submits:

- As Exhibit 1 to this pleading, the paragraph-by-paragraph chart that Walgreens previously submitted, with an additional column for citations to the sources being submitted to the Court to provide further description and detail.
- As Exhibit 2 to this pleading, the Declaration of Catherine Stimmel, who serves as Walgreens’ Chief Controlled Substance Compliance Officer.
- Three exhibits to Ms. Stimmel’s Declaration:
  - As Stimmel Decl. Exhibit A, the Charter for Walgreens’ Controlled Substance Compliance Committee (“CSCC Charter”).

- As Stimmel Decl. Exhibit B, the current version of Walgreens' Dispensing Prescription Products Policy ("DPP Policy").
- As Stimmel Decl. Exhibit C, the current version of Walgreens' Good Faith Dispensing of Controlled Substances Policy ("GFD Policy").

These materials are submitted to the Court under seal as suggested by the Special Master's email.

Dated: October 25, 2022

Respectfully submitted,

/s/ Kaspar J. Stoffelmayr

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2022 the foregoing Further Response to the Court's October 7, 2022 Order was electronically filed and served on all counsel of record through the Court's electronic filing system.

/s/ Kaspar J. Stoffelmayr  
Kaspar J. Stoffelmayr

Dated: October 25, 2022